



Advocates for Workplace Fairness

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/19/2019

Via ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: Ulke Rowe v. Google LLC, Case No. 1:19-cv-08655-LGS

Dear Judge Schofield:

Counsel for Plaintiff and Defendant jointly write to request an adjournment of the preliminary conference in this case, which is currently scheduled for November 21, 2019 at 10:40 a.m., as well as the Court's related order that the Parties file their joint letter and proposed Case Management Plan and Scheduling Order no later than November 18, 2019 at 10:00 a.m.

Plaintiff has received a Notice of Right to Sue from the Equal Employment Opportunity Commission and, consequently, intends to file an amended complaint in this action. Additionally, this case is subject to the Second Amended Standing Administrative Order, 11-Misc-003 (S.D.N.Y. Oct. 1, 2015) and the Initial Discovery Protocols for Employment Cases Alleging Adverse Action. An adjournment will promote efficiency as the information and documents exchanged in the initial discovery will aid the Parties in drafting the case management plan and scheduling order, as contemplated by the Standing Order incorporated into the Initial Discovery Protocols for Employment Cases Alleging Adverse Action. This is the Parties' first request for an adjournment.

The Parties have conferred and stipulated to the following schedule and respectfully request that the Court So Order the Proposed Schedule.

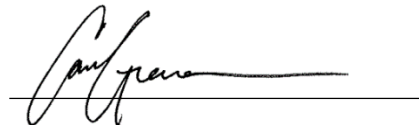
	Original Date:	Proposed Date:
Plaintiff to File First Amended Complaint		November 22, 2019
Defendant to File Answer to Plaintiff's First Amended Complaint		December 6, 2020
Completion of Initial Discovery pursuant to Pilot Project Protocols		January 7, 2020

Filing of joint letter and proposed Case Management Plan and Scheduling Order		January 13, 2020
Preliminary Conference	November 21, 2019	On or after January 13, 2020
Completion of Mediation		February 14, 2020

Respectfully submitted,



Kenneth W. Gage
Paul Hastings LLP
200 Park Avenue
New York, NY 10166
Counsel for the Defendant



Cara E. Greene
Outten & Golden LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Counsel for the Plaintiff

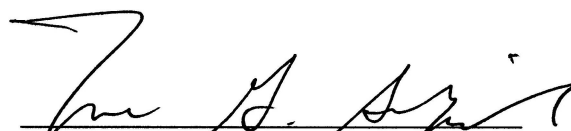
cc: All parties (via ECF)

Application DENIED IN PART. The Court does not ordinarily adjourn initial pretrial conferences pending an amended complaint.

The initial pretrial conference, scheduled for November 21, 2019, is adjourned to December 5, 2019, at 10:40 a.m. The parties shall file the joint letter and proposed Case Management Plan and Scheduling Order by November 28, 2019.

The parties shall otherwise comply with the schedule proposed herein: Plaintiff shall file the First Amended Complaint by November 22, 2019, Defendant shall file its answer by December 6, 2019, the parties shall complete the initial discovery required by the pilot discovery protocols by January 7, 2020 and the parties shall complete mediation by February 14, 2020.

Dated: November 19, 2019
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE